

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

MUTUAL PHARMACEUTICAL COMPANY,  
INC., et al.,

Plaintiffs,

-v-

WATSON PHARMACEUTICALS, INC., et al.,  
Defendants.

Civil Action No. 3:09-cv-5421 (GEB) (TJB)

Consolidated Case

**DECLARATION OF ERIC CARDINAL**

1. My name is Eric Cardinal, and I am competent to testify regarding the matters set forth herein. I have personal knowledge of all of the facts set forth in this Declaration.

2. I have been employed by Wolters Kluwer Health, Inc. and Medi-Span® (collectively "Wolters Kluwer") since February 2005, and I currently serve in the role of Director of Clinical Information and Drug File Products.

3. Medi-Span® ("Medi-Span"), a part of Wolters Kluwer, is a leading provider of drug information for thousands of health care professionals worldwide.

4. As a result of my job responsibilities, I am familiar with the kinds of documents, information, and databases regularly maintained and stored by Wolters Kluwer in the ordinary course of business.

5. The documents stamped WKM 0514 through 0549 were produced by Wolters Kluwer in the above-captioned lawsuit in response to a subpoena issued by West-Ward Pharmaceutical Corp. These documents are true and accurate copies of screenshots obtained directly from Medi-Span's Price-Rx database, as such database is regularly maintained in the regular course of business.

6. The documents stamped WKM 0514 through 0549 were printed and produced as they appeared on the Medi-Span Price Rx database on July 7, 2010 and were not altered in any way. Such information was available as of that date in the same format to Medi-Span's customers.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 14, 2010.

A handwritten signature in black ink, appearing to read "Eric Cardinal", written over a horizontal line.

Signature

The name "Eric Cardinal" printed in a serif font, positioned below the signature line.

Print Name

# **EXHIBIT A**

# **REDACTED**

**WKM 0514  
through  
WKM 0522**